

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE
MIDDLE DISTRICT OF ALABAMA, EASTERN DIVISION,

B. B. a minor, by and)
through his mother and next friend,)
OWENA KNOWLES,)
Plaintiff,)
v.) Civil Action No.: 3:06cv715-MHT
PAWN CITY, INC.; INTERSTATE)
ARMS CORPORATION; NORINCO)
a/k/a CHINA NORTH INDUSTRIES)
CORPORATION, QIQIHAIR HAWK)
INDUSTRIES, et al.,)
Defendants.)

MOTION TO EXTEND SCHEDULING ORDER

COMES NOW the plaintiff and hereby moves this Court for an Order extending all deadlines in the Scheduling Order entered by the Court on September 11, 2006. Plaintiff requests that all deadlines contained therein be extended for sixty (60) days. As grounds therefore, plaintiff states as follows:

1. This lawsuit was removed to District Court on August 10, 2006. On September 11, 2006, the Court entered a Scheduling Order setting a discovery deadline of April 20, 2007, December 1, 2006 and a deadline of May 4, 2007 to file dispositive motions.
2. Defendant Norinco has not yet responded to discovery propounded on or about November 27, 2006. Counsel for Defendant Norinco has indicated that the delay is due to the language barrier, as said Defendant is a Chinese corporation.
3. Because of the delay in obtaining Defendant Norinco's responses to discovery, the Plaintiff has been unable to conclude the additional discovery necessary to meet the previously imposed deadlines.

WHEREFORE, PREMISES CONSIDERED, defendant prays that this Court will enter an Order extending the deadlines in the September 11, 2006 Scheduling Order for sixty (60) days.

/s/ David J. Hodge
DAVID J. HODGE
Of Counsel for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of February, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: All counsel of record.

I hereby further certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Qiqihar Hawk Industries
No. 3 Delong Road
Technique Industrial Development District
Heilong Jiang Proy Province
Peoples Republic of China

/s/**David J. Hodge**
Of Counsel for Plaintiff